

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

PROMIER PRODUCTS INC.,

Plaintiff,

v.

GEAROS, *et al.*,

Defendants.

Civil Action No. 25-cv-497

(Judge Colville)

**DECLARATION OF STANLEY D. FERENCE III**

I, STANLEY D. FERENCE III, hereby declare as follows:

1. I am an attorney with the law firm of Ference & Associates LLC (“the Ference Firm”), located at 409 Broad Street, Pittsburgh, Pennsylvania 15143 and represent Plaintiff in the above-referenced action. I make and submit this declaration in support of Plaintiff’s Motion to Defer Defendants’ Motion [102] and to Conduct Early ADR, or Alternatively to Conduct Jurisdictional Discovery. I am over 18 years of age, and have personal knowledge of the facts set forth herein. If called upon to do so, I could and would competently testify to the following facts set forth below.

2. Amazon has reported the group of Defendants who have moved to dismiss the Amended Complaint have, combined, sold 108,113 units of product that are the subject of this lawsuit and received \$3,214,948.69 in revenue. This breaks down as follows: CR outdoor lighting (Def. No. 33) – 50,475 units sold for \$1,379,826.00 in revenue; Ewenele (Def. No. 45) – 991 units sold for \$37,218.27 in revenue; Minsk Store (Def. No. 86) – 1,295 units sold for \$59,526.07 in revenue; OLDBER Prime goods (Def. No. 97) – 3,726 units sold for \$121,489.70

in revenue; PHLIPESAM (Def. No. 101) – 8,375 units sold for \$247,126.94 in revenue;  
SIUYIU-US (Def. No. 114) – 2,548 units sold for \$124,111.27 in revenue; Trixhub (Def. No.  
127) – 26,386 units sold for \$615,041.47 in revenue; and Uhanciny (Def. No. 128) – 14,317 units  
sold for \$630,608.97 in revenue

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Pittsburgh, Pennsylvania  
September 9, 2025

/Stanley D. Ference III/  
Stanley D. Ference III